

Beginning on a date unknown to the United States Grand Jury, and continuing thereafter until at least October 28, 2015, in the Eastern District of Texas and elsewhere, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, the defendants herein, did knowingly, intentionally and unlawfully, combine, conspire, confederate, and agree with each other and with others, both known and unknown to the United States Grand Jury, to violate the laws of the United States of America, to wit, 21 U.S.C. § 841(a)(1), prohibiting the possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual), a Schedule II controlled substance.

MANNER AND MEANS

The conspirators refer to themselves as the “Four Corners” or “4C” gang among other names. The conspirators distribute methamphetamine and other controlled substances in the area of Loop 323 and Highway 69 in Tyler, Texas which the conspirators refer to as “Four Corners”. The conspirators utilize hotel rooms in the area to distribute methamphetamine and use controlled substances, and to arrange distribution of controlled substances in nearby parking lots and elsewhere. A primary goal of the conspiracy is to control the area referred to as “Four Corners” for the purpose of distributing methamphetamine and engaging in other criminal activity. Throughout the time frame of

the conspiracy, the conspirators utilized social media such as Facebook to communicate and posture regarding their illegal activities. The conspirators worked together to supply each other with methamphetamine for distribution and utilized multiple sources of methamphetamine.

OVERT ACTS

In furtherance of said conspiracy and to effect the objectives thereof, one or more of the following overt acts were committed within the Eastern District of Texas.

1. On or about April 17, 2015, defendant LETAJAL BROWN, aka "LT", aka "Master Pookie", distributed methamphetamine in the Four Corners area in Tyler, Texas.
2. On or about April 28, 2015, defendant TERRY CAIN distributed methamphetamine at the Economy Inn in Tyler, Texas.
3. On or about April 28, 2015, defendant LETAJAL BROWN aka "LT", aka "Master Pookie", and MANDY HANSEN aka "Sno Barbie", aka "Barbie Love", distributed methamphetamine in the Four Corners area in Tyler, Texas.
4. On or about May 6, 2015, defendants LETAJAL BROWN aka "LT", aka "Master Pookie", MICHAEL TAYLOR aka "Sip", and MANDY HANSEN aka "Sno Barbie", aka "Barbie Love", distributed methamphetamine at the Royal Inn in Tyler, Texas.
5. On or about May 13, 2015, in Kaufman County, Texas, defendant MANDY HANSEN aka "Sno Barbie", aka "Barbie Love", was arrested with an unindicted conspirator who possessed methamphetamine.

6. On or about May 14, 2015, defendants LETAJAL BROWN aka "LT", aka "Master Pookie", and MICHAEL WILLIS, JR., aka "Junior" distributed approximately 8 grams of methamphetamine near the Four Corners area in Tyler, Texas.

7. On or about May 15, 2015, defendants NAOMI LIPSCOMB and TRAVION BLACK aka "Tray" aka "Tray Da Long Way" distributed methamphetamine at the Royal Inn in Tyler, Texas.

8. On or about May 20, 2015, defendants LETAJAL BROWN aka "LT", aka "Master Pookie", and MICHAEL TAYLOR aka "Sip" distributed approximately one ounce of methamphetamine near the Four Corners area in Tyler, Texas.

9. On or about June 3, 2015, defendant PATRICK FOREMAN distributed methamphetamine and discussed the sale of a firearm.

10. On or about June 4, 2015, defendant PATRICK FOREMAN distributed methamphetamine and a firearm.

11. On or about June 11, 2015, defendant PATRICK FOREMAN distributed methamphetamine.

12. On or about June 13, 2015, defendant TRAVION BLACK aka "Tray" aka "Tray Da Long Way" possessed methamphetamine at the Royal Inn in Tyler, Texas.

13. On or about June 29, 2015, defendant TRAVION BLACK aka "Tray" aka "Tray Da Long Way" discussed the sale of methamphetamine and firearms and distributed a substance BLACK represented to be methamphetamine, near the Four Corners area in Tyler, Texas.

14. On or about July 6, 2015 near the Economy Inn in the Four Corners area in Tyler, Texas, defendant TERRY CAIN, possessed a firearm and a 15 round magazine while evading arrest.

15. On or about August 23, 2015, defendants IVIN MORGAN and VERNON HILL possessed methamphetamine.

16. On or about September 22, 2015, defendant JENNIFER DENISE DUNCAN, distributed methamphetamine and possessed approximately 255 grams of methamphetamine, digital scales, and syringes.

17. On or about September 23, 2015, defendants MICHAEL SHON MCKINLEY and DANIEL LEE WHITAKER, aka "D", possessed and distributed methamphetamine.

18. On or about October 7, 2015, defendant DANIEL LEE WHITAKER, aka "D", discussed the availability and distribution of methamphetamine and sold an assault type semi-automatic rifle WHITAKER represented to be a machine gun.

19. On or about October 20, 2015, defendant DEMARCUS MOORE, aka "King Moe", possessed methamphetamine, another controlled substance, a smoking pipe, and baggies in the Four Corners area of Tyler, Texas.

All in violation of 21 U.S.C. § 846.

COUNT TWO

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about April 17, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT THREE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about April 28, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FOUR

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about April 28, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FIVE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about May 6, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT SIX

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about May 14, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT SEVEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about May 15, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT EIGHT

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about May 20, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT NINE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about June 3, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT TEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about June 4, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT ELEVEN

Violation: 18 U.S.C. § 924(c)
(Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about June 4, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which

they may be prosecuted in a court of the United States, that is possession with intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count Ten of this indictment, and in furtherance of said crime possessed a firearm, in violation of 18 U.S.C. § 924(c).

COUNT TWELVE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about June 11, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT THIRTEEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about June 13, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”,**

Mandy Hansen, aka "Sno Barbie", aka "Barbie Love", Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka "King Moe", Daniel Lee Whitaker, aka "D", Jennifer Denise Duncan, and Michael Shon McKinley, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FOURTEEN

Violation: 18 U.S.C. § 924(c)
(Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about July 6, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka "LT", aka "Master Pookie", Terry Cain, Michael Taylor, aka "Sip", Travion Black, aka "Tray", aka "Tray Da Long Way", Michael Willis, Jr., aka "Junior", Mandy Hansen, aka "Sno Barbie", aka "Barbie Love", Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka "King Moe", Daniel Lee Whitaker, aka "D", Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, and in furtherance of said crime possessed a firearm, in violation of 18 U.S.C. § 924(c).

COUNT FIFTEEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about August 23, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT SIXTEEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about September 22, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT SEVENTEEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about September 23, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT EIGHTEEN

Violation: 18 U.S.C. § 924(c)
(Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about October 7, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking

crime for which they may be prosecuted in a court of the United States, that is conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, and in furtherance of said crime possessed a firearm, in violation of 18 U.S.C. § 924(c).

COUNT NINETEEN

Violation: 18 U.S.C. § 922(g)
(Felon in possession of a firearm)

On or about October 7, 2015, in the Eastern District of Texas, **Daniel Lee Whitaker, aka "D"**, defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically: Credit Card Abuse, in Case No. 34333-B in the 124th District Court, Gregg County, Texas on January 25, 2007; Evading Arrest, in Case No. F-0724226-J in Criminal District Court #3, Dallas County, Texas on April 7, 2008; Unlawful Possession of a Fraudulent ID, in Case No. F-05-41064-L in Criminal District Court #5, Dallas County, Texas on February 13, 2007; Forgery, in Case No. F-0840245-J in Criminal District Court #3 in Dallas County, Texas on April 7, 2008; and Unlawful Possession of a Fraudulent ID, in Case No. F-0840273-J in Criminal District Court #3 in Dallas County, Texas on April 7, 2008 did knowingly and intentionally possess a firearm, to wit: a Century Arms AK-47 rifle, which had been shipped and transported in interstate commerce, in violation of 18 U.S.C. § 922(g).

COUNT TWENTY

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about October 20, 2015, in the Eastern District of Texas, **Patrick Foreman, Letajal Brown, aka “LT”, aka “Master Pookie”, Terry Cain, Michael Taylor, aka “Sip”, Travion Black, aka “Tray”, aka “Tray Da Long Way”, Michael Willis, Jr., aka “Junior”, Mandy Hansen, aka “Sno Barbie”, aka “Barbie Love”, Naomi Lipscomb, Ivin Morgan, Vernon Hill, Demarcus Moore, aka “King Moe”, Daniel Lee Whitaker, aka “D”, Jennifer Denise Duncan, and Michael Shon McKinley**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT TWENTY ONE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about January 28, 2013, in the Eastern District of Texas, **Michael Taylor, aka “Sip”**, defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, & 28 U.S.C. §2461

As the result of committing one or more of the foregoing offenses alleged in this indictment, the defendants herein shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violations;
2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and/or;

CASH PROCEEDS

\$100,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States

and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461.

A TRUE BILL

Bk

GRAND JURY FOREPERSON

JOHN M. BALES
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Bill Baldwin
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10-28-2015
Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA §
V. §
§ CRIMINAL NO. 6:15CR _____
§ JUDGE _____

PATRICK FOREMAN (01) §
LETAJAL BROWN, (02) §
 aka "LT", aka "Master Pookie" §
TERRY CAIN (03) §
MICHAEL TAYLOR, aka "Sip" (04) §
TRAVION BLACK, (05) §
 aka "Tray", aka "Tray Da Long Way" §
MICHAEL WILLIS JR., aka "Junior" (06) §
MANDY HANSEN, (07) §
 aka "Sno Barbie", aka "Barbie Love" §
NAOMI LIPSCOMB (08) §
IVIN MORGAN (09) §
VERNON HILL (10) §
DEMARCUS MOORE (11) §
 aka "King Moe" §
DANIEL LEE WHITAKER (12) §
 aka "D" §
JENNIFER DENISE DUNCAN (13) §
MICHAEL SHON MCKINLEY (14) §

§ SEALED

NOTICE OF PENALTY
COUNT 1

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance)

Penalty: Imprisonment for a term of not less than 10 years or more than life, a fine not to exceed \$10,000,000, or both. A term of supervised release of at least 5 years in addition to such term of imprisonment.

Special Assessment: \$100.00

COUNTS 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 15, 16, 17, 20, 21

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute and distribution of methamphetamine, a Schedule II controlled substance)

Penalty: Imprisonment for a term of not more than 20 years, a fine not to exceed \$1,000,000, or both. A term of supervised release of at least 3 years in addition to such term of imprisonment.

Special Assessment: \$100.00

COUNTS 11, 14, 18

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

Penalty: Imprisonment for a term of not less than 5 years or more than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000, or both. A term of supervised release of not more than 5 years in addition to such term of imprisonment.

In the case of a second or subsequent conviction of this offense, the term of imprisonment shall not be less than 25 years.

Special Assessment: \$100.00

COUNTS 19

Violation: 18 U.S.C. § 922(g) (Felon in possession of a firearm)

Penalty: Imprisonment for a term of not more than 10 years, a fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years.

Special Assessment: \$100.00